

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

MICHAEL MCLOCHLIN

PLAINTIFF

VERSUS

1:24-cv-00051-HSO-BWR

ERALDO LAPETRA

DEFENDANT

AFFIDAVIT OF MICHAEL MCLOCHLIN

STATE OF INDIANA
COUNTY OF HAMILTON

My name is Michael McLochlin. I reside at 7280 Oak Cove Lane in Noblesville, Indiana. I am above the age of 18 years old, have not been convicted of a felony and I am competent to swear to the matters stated herein. I am the Plaintiff in this matter, and I make this Affidavit under oath, upon information that is within my personal knowledge and my belief thereof. I have read and do understand the statements made herein and further state that I do freely and voluntarily make and execute this Affidavit under penalty of perjury.

On or about April 10, 2022, I met the Defendant, Eraldo LaPietra, while on an airplane flight to the Beau Rivage Casino in Biloxi, Mississippi. Both LaPietra and I had been invited by MGM casinos to fly to and stay at the Beau Rivage Casino in Biloxi, Mississippi, as both Mr. LaPietra and I were patrons of, and had been gambling large amounts of money at the MGM casinos.

LaPietra told me that he frequently gambled large sums of money throughout the country and that the casinos, including MGM properties in Vegas and the Beau Rivage Casino in Biloxi, Mississippi, would often provide him with complimentary lodging, food, beverages and tickets to

various entertainment. LaPietra informed me that, like me, MGM casinos had paid for this trip to Biloxi and his room, food, beverages and tickets to events.

On April 10, 2022, LaPietra advised me that he had run out of money and asked me for a very short-term loan in the amount of \$300,000.00, which he stated he would repay within a day or two. Based on his statements of being a “high-roller” gambler, I believed LaPietra’s promise to immediately repay the loan.

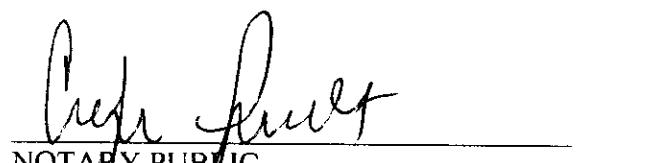
When the loan was not repaid in a couple of days, I began texting LaPietra. From on or about April 2022 through on or about November 2022, LaPietra made numerous promises via text messages to pay me back. LaPietra would text me, stating that the \$300,000.00 would be placed by him at a cashier’s cage for me to pick up, but those statements were just as false as his earlier promise to pay me back immediately or within a couple of days. On every occasion which LaPietra arranged to repay the loan to me, LaPietra failed. Therefore, I believe that LaPietra had no intention of repaying the loan when he asked me for it.

FURTHER, AFFIANT SAYETH NOT



MICHAEL MCLOCHLIN

SWORN TO AND SUBSCRIBED BEFORE ME, this the 25th day of July, 2024.



CINDY FULWIDER
NOTARY PUBLIC
My Commission Expires: October 6, 2029

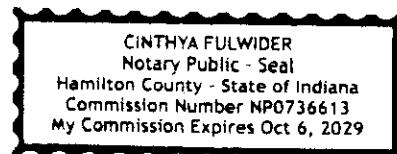


EXHIBIT "A"